

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE: BAIR HUGGER FORCED AIR
WARMING PRODUCTS LIABILITY
LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates to ALL ACTIONS

DECLARATION OF GENEVIEVE M. ZIMMERMAN

1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbeshier & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
2. Attached hereto as Exhibit 1 is a true and correct copy of portions of the Deposition of John Rock, taken in Minneapolis, MN on November 4, 2016.
3. Attached hereto as Exhibit 2 is a true and correct copy of 3MBH00053467-3MBH00053472.
4. Attached hereto as Exhibit 3 is a true and correct copy of portions of the Deposition of Dr. Daniel Sessler, taken in Ohio on January 11, 2017.
5. Attached hereto as Exhibit 4 is a true and correct copy of 3MBH00047382-3MBH00047383.
6. Attached hereto as Exhibit 5 is a true and correct copy of 3MBH01897094.
7. Attached hereto as Exhibit 6 is a true and correct copy of portions of the Deposition of Gary L. Hansen, taken in Minneapolis, MN on November 2, 2016.
8. Attached hereto as Exhibit 7 is a true and correct copy of 3MBH00022367.
9. Attached hereto as Exhibit 8 is a true and correct copy of 3MBH01031246.
10. Attached hereto as Exhibit 9 is a true and correct copy of 3MBH00018311.

11. Attached hereto as Exhibit 10 is a true and correct copy of Document bearing Bates Number 3MBH00048067-3MBH00048085.
12. Attached hereto as Exhibit 11 is a true and correct copy of Document bearing Bates Number 3MBH00107862.
13. Attached hereto as Exhibit 12 is a true and correct copy of Document bearing Bates Number 3MBH00126140.
14. Attached hereto as Exhibit 13 is a true and correct copy of Document bearing Bates Number 3MBH00132832.
15. Attached hereto as Exhibit 14 is a true and correct copy of Document bearing Bates Number 3MBH00008025
16. Attached hereto as Exhibit 15 is a true and correct copy of Document bearing Bates Number 3MBH00018429-431.
17. Attached hereto as Exhibit 16 is a true and correct copy of Document bearing Bates Number 3MBH00025739.
18. Attached hereto as Exhibit 17 is a true and correct copy of Document bearing Bates Number 3MBH00008941.
19. Attached hereto as Exhibit 18 is a true and correct copy of Document bearing Bates Number 3MBH0024592.
20. Attached hereto as Exhibit 19 is a true and correct copy of Document bearing Bates Number 3MBH00002647.
21. Attached hereto as Exhibit 20 is a true and correct copy of Document bearing Bates Number 3MBH00024633.
22. Attached hereto as Exhibit 21 is a true and correct copy of Document bearing Bates Number 3MBH00024678.

23. Attached hereto as Exhibit 22 is a true and correct copy of Document bearing Bates Number 3MBH00545125.
24. Attached hereto as Exhibit 23 is a true and correct copy of Document bearing Bates Number 3MBH00022625.
25. Attached hereto as Exhibit 24 is a true and correct copy of Document bearing Bates Number 3MBH00022877.
26. Attached hereto as Exhibit 25 is a true and correct copy of Document bearing Bates Number 3MBH00031184.
27. Attached hereto as Exhibit 26 is a true and correct copy of cited portions of the deposition transcript of Teri Woodwick-Sides.
28. Attached hereto as Exhibit 27 is a true and correct copy of Document bearing Bates Number 3MBH00005575.
29. Attached hereto as Exhibit 28 is a true and correct copy of Document bearing Bates Number 3MBH00052987.
30. Attached hereto as Exhibit 29 is a true and correct copy of Document bearing Bates Number 3MBH00053468.
31. Attached hereto as Exhibit 30 is a true and correct copy of Document bearing Bates Number 3MBH00109033.
32. Attached hereto as Exhibit 31 is a true and correct copy of Document bearing Bates Number 3MBH00580475.
33. Attached hereto as Exhibit 32 is a true and correct copy of cited portions from the deposition transcript of Dr. Paul McGovern.
34. Attached hereto as Exhibit 33 is a true and correct copy of cited portions from the deposition transcript of Mr. Michael Reed.
35. Attached hereto as Exhibit 34 is a true and correct copy of cited portions from the deposition transcript of Christopher Nachtsheim.

36. Attached hereto as Exhibit 35 is a true and correct copy of Document bearing Bates Number 3MBH000001557.
37. Attached hereto as Exhibit 36 is a true and correct copy of Document bearing Bates Number 3MBH00050756.
38. Attached hereto as Exhibit 37 is a true and correct copy of Document bearing Bates Number 3MBH00024809.
39. Attached hereto as Exhibit 38 is a true and correct copy of Document bearing Bates Number 3MBH01224622.
40. Attached hereto as Exhibit 39 is a true and correct copy of Document bearing Bates Number 3MBH00130429.
41. Attached hereto as Exhibit 40 is a true and correct copy of Document bearing Bates Number 3MBH00083780.
42. Attached hereto as Exhibit 41 is a true and correct copy of Document bearing Bates Number 3MBH01211442.
43. Attached hereto as Exhibit 42 is a true and correct copy of Document bearing Bates Number 3MBH00051252.
44. Attached hereto as Exhibit 43 is a true and correct copy of Document bearing Bates Number 3MBH00575107.
45. Attached hereto as Exhibit 44 is a true and correct copy of Document bearing Bates Number 3MBH00575251.
46. Attached hereto as Exhibit 45 is a true and correct copy of Document bearing Bates Number 3MBH01619270.
47. Attached hereto as Exhibit 46 is a true and correct copy of Document bearing Bates Number 3MBH0055876.

48. Attached hereto as Exhibit 47 is a true and correct copy of Document bearing Bates Number 3MBH00134035.
49. Attached hereto as Exhibit 48 is a true and correct copy of Document bearing Bates Number 3MBH00107719.
50. Attached hereto as Exhibit 49 is a true and correct copy of Document bearing Bates Number 3MBH01330588.
51. Attached hereto as Exhibit 50 is a true and correct copy of the cited portions of the deposition transcript of Andrea Kurz.
52. Attached hereto as Exhibit 51 is a true and correct copy of an article announcing 3M's distribution of VitaHeat products.
53. Attached hereto as Exhibit 52 is a true and correct copy of an article outlining VitaHeat products.
54. Attached hereto as Exhibit 53 is a true and correct copy of the draft minutes of the Center for Disease Control's HICPAC from November 2015.

Dated: January 26, 2017

/s/ Genevieve M. Zimmerman

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